

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 05/31/2022
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant
Willkie Farr & Gallagher LLP
- (b) Registration Number
7047
- (c) Primary Business Address
787 Seventh Avenue, New York, NY 10019

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response				

(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Ceased
See Appendix for Additional Names		

5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services

(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

Yes ☒ No ☐

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
Devin Ringger	The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")		UNITED STATES	Associate	12/07/2021

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing?

Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")

10. (a) Have the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³Yes ☐No ☐N/A ☒Exhibit B⁴Yes ☐No ☐N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and/or B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☐No ☒

If yes, has the registrant filed an amendment to these exhibits?

Yes ☐No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal

The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")

Activities/Services

Acting on behalf of PDVH, the registrant has interacted with U.S. Government officials to advocate for a resolution to various creditor claims against the Government of Venezuela and/or its state-owned corporations in which PDVH and/or its subsidiaries are a party or in which the value of PDVH and/or its subsidiaries is implicated by the claim.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal**Activities/Services**

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) **RECEIPTS-MONIES**

If no, please explain why no monies were received.

\$	134,525.66
<hr/>	
Total	

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	02/28/2022	LoopUp	This disbursement was made by Willkie in connection with its work on behalf of PDVH in the relevant period pursuant to the activities that are the subject of this registration. This response excludes those disbursements made in connection with work performed in other matters or under the terms of separate client engagements.	\$ 2.67	
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	-----	-----	-----	----->	\$ 2.67

\$ 2.67
Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
02/16/2022	Michael Gottlieb	Josh Riley for Congress	Money Contribution	\$ 5,800.00
04/25/2022	Michael Gottlieb	The Jewish Democratic Council of America	Money Contribution	\$ 1,000.00
04/27/2022	Michael Gottlieb	Rebecca Kanter for Judge	Money Contribution	\$ 1,000.00
05/12/2022	Michael Gottlieb	Bruce Spiva for DC AG	Money Contribution	\$ 1,500.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☐ No ☒

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|--|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

20. Indicate the language used in the informational materials:

- | | |
|----------------------------------|--|
| <input type="checkbox"/> English | <input type="checkbox"/> Other (specify) _____ |
|----------------------------------|--|

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature¹³06/30/2022Matthew A. Feldman/s/Matthew A. Feldman

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

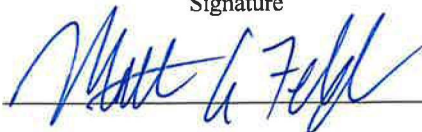
Date

Printed Name

Signature

6/30/22

Matthew A. Feldman



Appendix
Response to Item 4(a) Attached

Item 4(a): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? If yes, furnish the following information:

List of Persons Who Were Added As Partners/Officers/Directors

Below please find the persons who have become partners, officers, directors or similar officials during the relevant 6-month reporting period. Residential addresses are provided to the Department of Justice under separate cover.

Name	Citizenship	Position	Date Assumed
Morgan Elwyn	United States	Member of the Executive Committee	01/01/2022

Appendix
Response to Item 4(b) Attached

Item 4(b): Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? If yes, furnish the following information:

List of Persons Who Were Ceased As Partners/Officers/Directors

Below please find the persons who have ceased acting as partners officers, directors or similar officials during the relevant 6-month reporting period.

Name	Position	Date Ceased
Bruce Herzog	Member of the Executive Committee	03/16/2022
Martin Weinstein	Member of the Executive Committee	12/31/2021

Appendix

Response to Item 12-Description

The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board"): As reflected below, acting on behalf of PDVH, the registrant has participated in meetings with representatives of the U.S. Government in an effort to protect the assets of PDVH and its subsidiaries from seizure or diminution in value by creditors of the Maduro regime, as well as PDVH's ongoing interests in the operations and stability of its various subsidiaries.

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	12/07/2021	Isaac Jalkanen, Jon Broderick, Henry Juvera, Laura Eriksen	Videoconference	Meeting with Office of Senator Cornyn relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	12/14/2021	Erum Ibrahim (Legislative Assistant), Scott Jorgenson	Videoconference	Meeting with Office of Senator Durbin relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	12/22/2021	Dr. Ali Nouri, Elizabeth Urbanas, Matthew Cline, Elizabeth Noll, Lauren Joyce	Videoconference	Meeting with Department of Energy relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	12/22/2021	Brandon Yoder (Senior Professional Staff), Andrea Samuelson (Legislative Fellow)	Videoconference	Meeting with Senate Foreign Relations Committee relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	01/14/2022	Blake Schindler (Energy Policy Adviser) and Joel Hirst (Foreign Policy Adviser)	Videoconference	Meeting with Office of Senator Cassidy relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	01/19/2022	Viviana Bovo, Alex Moree, Will Green	Videoconference	Meeting with Office of Senator Rubio relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	01/19/2022	Andrew Kalaris (Legislative Assistant)	Call	Meeting with Office of Senator Kaine relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	01/26/2022	Lauren Nunnally, Nathan Flagg, James Shea	Videoconference	Meeting with Office of Senator Kennedy relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	01/27/2022	Sen. Tim Kaine, Nicole Porreca, Andrew Kalaris	Videoconference	Meeting with Office of Senator Kaine relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	01/31/2022	Brian Nichols, K. O'Reilly, L. Lochman, T. Kill, B. Levin, M. Woonacott, E. Belson, K. Greer	Videoconference	Meeting with State Department relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	03/31/2022	Andrew Kalaris (Legislative Assistant)	Call	Follow-up meeting with Office of Senator Kaine relating to the issues described above in Item 12-Description.

Foreign Principal(s)	Date	Contact	Method	Purpose
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	04/26/2022	Joel Hirst (Foreign Policy Adviser)	Call	Follow-up meeting with Office of Senator Cassidy relating to the issues described above in Item 12-Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	05/13/2022	Mark Wells, Pamela Bates, Theodore Kill, Benjamin Levin	Videoconference	Meeting with Department of State relating to the issues described above in Item 12- Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	05/13/2022	M. Kaplan, T. Posner, C. McCleskey, J. Twinem, N. Thomas, A. Akgun, C. Cohen, J. Prince, K Cochrane	Videoconference	Meeting with Dep't of Treasury relating to the issues described above in Item 12- Description.
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	05/25/2022	Victor Cervino	Videoconference	Meeting with Office of Senator Risch relating to the issues described above in Item 12- Description.

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	03/10/2022	PDVH	Willkie has never entered into any engagement agreement with PDVSA, the Ad Hoc Board of PDVSA, or the Bolivarian Republic of Venezuela, and has no receipts from any of those entities. Willkie understands that under the Department of Justice's interpretation of the Foreign Agents Registration Act ("FARA"), Willkie's agreement with PDVH, the wholly owned subsidiary of PDVSA, may under certain circumstances require registration for activities benefitting the PDVSA Ad Hoc Board, notwithstanding the fact that Willkie does not represent and has no agreement to represent the PDVSA Ad Hoc Board. These fees were received by Willkie for the work performed for PDVH during the relevant period and that is the subject of this registration and does not include work performed in other matters or under the terms of separate client engagements.	\$ 8,302.80	
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	03/10/2022	PDVH	Please see above.	\$67,665.10	
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	03/10/2022	PDVH	Please see above.	\$42,260.72	

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	04/15/2022	PDVH	Please see above.	\$16,297.04	
The Ad Hoc Board of Petróleos de Venezuela, S.A. ("PDVSA Ad Hoc Board")	-----	-----	-----	----->	\$134,525.66